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DOTY - MOORE TOWER SERVICES, INC.

For Complete Tower Service

Featuring Expertise & Integrity

January 10, 1994

Office Of the Secretary
Federal communication Commission
Washington, D.C. 20554

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JAN 11 1994

FCC MAIL ROOM

Subject: Notice of Proposed Rulemaking
ET Docket # 93-62
Guidelines for Evaluating the Environmental
Effects of Radiofrequency Radiation

On May 17, 1993, we had visited Dr. Robert Cleveland in Washington with Maxwell Safety Products, Ltd. to discuss several points regarding ANSI/IEEE C95.1-1992. During our discussion the topic of compliance from the telecommunications (paging, cellular, two-way....) industries came up. We had offered to supply the FCC with a small sampling of surveys from metropolitan rooftops in the Dallas/Fort Worth area in order to show that broadcasters are indeed not the only parties needing to be mindful of compliance.

Enclosed are two studies done in multiple emitter environments, solely from a combination of pagers, cellular and two-way antennae. In situations where clusters of antennae are present, creating a rooftop "antenna farm", if you will, it is evident that virtually every locale within the vicinity presents RF levels in excess of the C95.1-1992 MPE level at all times.

While some scenarios present a less challenging environment for technicians, these remains concern for non-technical (roofing maintenance, heating/air-conditioning, etc...) personnel who would have reason to be working in these potentially hazardous environments.

We understand that in such situations, it becomes nearly impossible to coordinate participation of the owners of these systems to shut down power, and we feel that the primary responsibility should lie with the landlord/site manager in these cases. Limiting access to the rooftops to individuals who shall be supplied with the necessary protective equipment helps to lessen the liability of all the parties concerned.

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With other types of rooftop configurations, where the roof perimeter is lined with radiators, there is less of a problem because most maintenance is performed away from the edges of the roof, and RF hazards will only come from one or two directions. Still, our measurements indicate that within 3 feet of these antennae (and a 5-to 6-foot height), the C95.1-1992 MPE level is continuously exceeded.

There are, however, virtually no induced currents to worry about, since these non-broadcast frequencies are above the 100 MHz limit, below which the standard designates the induced current concern.

We submit this information as a sampling, to demonstrate that any claims that these types of systems in multiple environments remain in compliance are simply not true.

If you have any questions, we shall be happy to discuss them with you.

Very Truly Yours,



Donald T. Doty
President.

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METER READINGS WERE 4-7mW/cm²
AT 2 TO 3 FEET FROM ANY RADIATOR

35.6

1	2	3	4	5	6
7	8	9	10	11	12
13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30
31	32	33	34	35	36
37	38	39	40	41	42

COOLING TOWER

ELEVATOR MOTOR ROOM

F.A.A. STUDY # 92-ASW-0831
LATITUDE: 32-45-11
LONGITUDE: 97-19-46
GROUND ELEVATION = 608' A

MOUNT	ANTENNA	FREQUENCY	ID# OR COMBINER
ROOF 1	DB 809-Y	890-960	Knights Communications (duplex)
ROOF 2	HND12H0-V05	2500-2686	American Wireless
ROOF 3	DB 809-LH	816-820.1625	Knights Communications RX
ROOF 4	DB 413	450	Triccept Cleaning Crew (duplex)
ROOF 5	DB 420-A	450-470	U.S.P.O.
ROOF 6	Andrew 63159	2150-2163	American Wireless
ROOF 7			
ROOF 8	DB 420-B	450-470	Conven
ROOF 9	HND12V0-V05	2500-2686	
ROOF 10	Andrew 63150	2150-2163	American Wireless
ROOF 11			
ROOF 12	Celcova		MobileComm
ROOF 13	DB 806-Z	851-960	S.V.B.P. (Metro Radio)
ROOF 14	DB 413-B	450-470	S.V.B.P. (Metro Radio)
ROOF 15	DB 205-M	150-174	S.V.B.P. (Metro Radio)
ROOF 16	BMR 10-D	806-869	Knights Communications Trunk TX
ROOF 17	OFF AIR FM RADIO	88-106	Bank One (Muzak RX)
ROOF 18	DB 230-E	66-88	AACS Communications
ROOF 19	DB 809-Z	851-960	McCoy Communications
ROOF 20	Andrew	806-866	IBM
ROOF 21			
ROOF 22	DB 222/DB 495	50-160/806-949	STE 2 ents on mount

MOUNT	ANTENNA	FREQUENCY	ID# OR COMBINER
ROOF 25	DB 480-A		TD Services (duplex)
ROOF 26			
ROOF 27	BPR-10	928-960	Hologram America
ROOF 28	DCB 222	150-160	AACS
ROOF 29	4' Microwave Dish		KXAS Channel 5 MICROWAVE
ROOF 30	DB 230-E/DB 498-K		MobileComm 2 ents. on this mount
ROOF 31	DB 222	150-160	CCSI
ROOF 32	DB 205	33-50	S.V.B.P. (Metro Radio)
ROOF 33			
ROOF 34	HNDH0-V05	2500-2686	American Wireless
ROOF 35	DB 420-B	450-470	KXAS Channel 5
ROOF 36	DB 230-E	66-88	S.V.B.P. (Metro Radio)
ROOF 37			CCSI
ROOF 38	DB 222	150-160	Perkney Paging
ROOF 39			
ROOF 40			
ROOF 41			
ROOF 42	PD 1142	25-54	MobileComm
ROOF A	DB 420-E	450-470	Gifford Hill (DUPLEX)
ROOF B	DB 210-B	33-88	Conven
ROOF C	DB 230-E	MNT. 19	CCSI
ROOF D	DB 437-D	470-494	McCoy

12-17-93

US DATA Bldg. Plano, TX

K. Pak

↑ N

(851-960 MHz)

(806-901 MHz)

DBB10-Z

DBB10-Z

DBB09-X

DBB09 H-XI

3 MW/cm²

3-4 MW/cm²

.2-3 MW/cm²

U

SB09SRX

806-901 MHz

OK

Receiving Dishes

Lower Level Dish

DBB10-X

851-960 MHz

OK

DBB10X

851-960 MHz

OK

D19d71

.6-1 MW/cm²

OK

OK

UNKNOWN

TV ANT.

TV Camera

Roof Access

870-915 MHz

DB 495-B Reflector

2-3 MW/cm²

4-6 MW/cm²

.7 MW/cm²

DBB09-Y

.2-2 MW/cm²

890-960 MHz

DBB10Z

806-901 MHz

740189 AS

OK